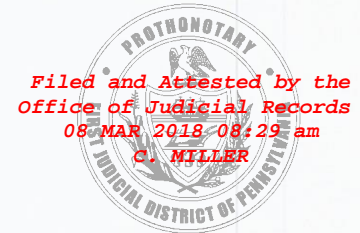


ANDERSON LAW GROUP, LLC
BY: RHONDA M. ANDERSON, Esquire
Attorney for Plaintiff
Attorney I.D. No. 82049
4840 OLD YORK ROAD
PHILADELPHIA, PA 19141
215-913-5672



DAWUD PRAY

Plaintiff

v.

WILLIAM ERNEST JOHNSON, III

Defendant

: IN THE COURT OF COMMON PLEAS OF
: PHILADELPHIA COUNTY, PENNSYLVANIA
: CIVIL ACTION- LAW

: No.

COMPLAINT – CIVIL ACTION
(QUIET TITLE – 24500)

NOTICE TO DEFEND

AVISO

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

Philadelphia Bar Association
Lawyer Referral and Information Service
1101 Market Street, 11th Floor
Philadelphia, Pennsylvania 19107-2911
Telephone: (215) 238-6333

Lo(a) han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las páginas siguientes, usted tiene veinte (20) días de plazo al partir de la fecha de la demanda y la notificación. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomará medidas y puede continuar la demanda en contra suya sin previo aviso o notificación. Además, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA. DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELÉFONO A LA OFICINA CUYA DIRECCIÓN SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

Asociación de Licenciados de Filadelfia
Servicio de Referencia e Información Legal
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DAWUD PRAY	:	IN THE COURT OF COMMON PLEAS OF
	:	PHILADELPHIA COUNTY, PENNSYLVANIA
	:	CIVIL ACTION- LAW
	:	
Plaintiff	:	No.
	:	
v.	:	
	:	
WILLIAM ERNEST JOHNSON, III	:	
	:	
Defendant	:	
	:	

COMPLAINT – CIVIL ACTION
(QUIET TITLE – 24500)

1. This is an action to quiet title to that certain piece of real property in the City and County of Philadelphia denominated as 1006 W. Dakota Street, Philadelphia, Pennsylvania, 19133 (the “Property”), and more fully described as follows:

PROPERTY DESCRIPTION ATTACHED HERETO AS EXHIBIT “A”

2. Plaintiff, Dawud Pray (“Plaintiff”), is an adult individual who resides at 7413 Gilbert Street, Philadelphia, Pennsylvania, 19138.

3. Defendant, William Ernest Johnson, III, is an adult individual maintaining an address at 301 Elwood Street, Philadelphia, Pennsylvania, 19144.

4. Venue lies in this Court, because these actions stem from occurrences that took place in Philadelphia County and that concern real property located in Philadelphia County.

5. Plaintiff obtained fee simple legal title to the property located at 1006 W. Dakota, Philadelphia, Pennsylvania, 19133 (the "Property"), by deed dated April 28, 2010, and recorded at Philadelphia, Pennsylvania, on May 12, 2010, Document ID No 52210384, from Denise Taylor.

6. At all times described herein, Plaintiff has owned in the Property.

7. On March 1, 2018, a deed dated February 20, 2018, was recorded at Philadelphia, Pennsylvania, as Document ID No. 53334171, purporting to transfer title of the Property from Plaintiff to Defendant. A copy of the Deed is attached hereto as Exhibit "B" and incorporated herein by reference as if set forth at length.

8. At no time since taking title to the Property on April 28, 2010, has Plaintiff signed any deed conveying title of the Property to any person or entity. Plaintiff had never heard of Defendant prior to discovering that this Deed had been recorded.

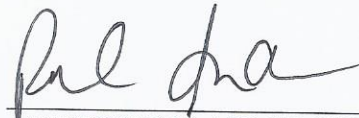
9. Defendant forged Plaintiff's signature on the Deed recorded on March 1, 2018.

10. Defendant did not acquire the Property from Plaintiff, because Plaintiff did not sign the deed recorded on March 1, 2018. As a result, any claim by Defendant to title to the Property is invalid.

11. Plaintiff is the lawful owner of the Property, and Plaintiff seeks a declaration and adjudication of that ownership and the issuance of a Deed confirming that ownership.

WHEREFORE, Plaintiff prays as follows:

1. For an Order declaring and adjudging that the deed dated February 20, 2018, and recorded at Philadelphia, Pennsylvania, on March 1, 2018, as Document ID No. 53334171, purportedly transferring to Defendant title to the real property located at 1006 W. Dakota Street, Philadelphia, PA, 19133, is void and cancelled of record;
2. For said Order to declare and adjudge that Plaintiff, Dawud Pray, owns the Property absolutely and in fee and is entitled to the quiet and peaceful possession of the Property; that Defendant and all persons claiming under him are forever barred from asserting any right, lien, title, or interest in or to said Property; and that title to the Property be quieted in the name of Plaintiff, Dawud Pray, against all claims of Defendant and all persons claiming under him;
3. For said Order to direct the Commissioner of the Department of Records of Philadelphia County to record a Deed of Confirmation, with the Court's Order attached, acknowledging Plaintiff, Dawud Pray, as owner of the real property located at 1006 W. Dakota Street, Philadelphia, PA, 19133; *and*
4. For the costs of this action, including attorney's fees, and for such other and further relief that this Court deems necessary and proper.

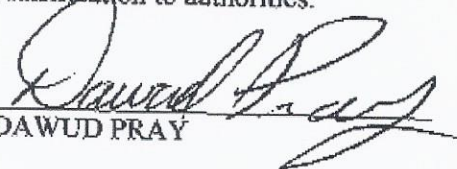


ANDERSON LAW GROUP, LLC
BY: RHONDA M. ANDERSON, Esquire
Attorney for Plaintiff
Attorney I.D. No. 82049
4840 OLD YORK ROAD
PHILADELPHIA, PA 19141
215-913-5672

Dated: March 8, 2018

VERIFICATION

DAWUD PRAY, being duly sworn according to law, deposes and says that he is the plaintiff in the within action, that the facts set forth in the foregoing Complaint are true and correct to the best of his knowledge, information, and belief, and he understands that false statements herein are made subject to the penalties of 18 Pa. C.S.A. § 4904, relating to unsworn falsification to authorities.


DAWUD PRAY

Dated: 3/8/18

EXHIBIT A

ALL THAT CERTAIN lot or piece of ground with the messuage or tenement thereon erected.

SITUATE on the South side of Dakota (formerly Dacota) Street at the distance of Ninety feet Westward from the West side of Tenth Street, in the 37th Ward of the City of Phila.

CONTAINING in front or breadth on said Dakota (formerly Dacota) Street Sixteen feet Two and one-half inches and extending of that width in length of depth Southward between parallel lines at right angles to said Dakota (formaly Dacota) Street sixty feet.

BOUNDED on the West partly by the head of a certain Two feet wide alley, leading Westward across the rear end of the lot adjoining to the Westward, the distance or seventeen feet Two and one-half inches into another certain Two feet wide alley which extends Northward into the said Dakota (formerly Dacota) Street (both of which alleys have been laid out and opened for the manual use and accommodation of the hereby granted premises and the two lots to the Westward thereof and adjoining and abutting upon said alleys, and the owners, tenants and occupiers thereof, with the right and privilege of the respective owners of the ground adjoining the said two feet wide alley running Northward to Build over or under the said alley to a depth of Thirty feet, leaving a least eight feet headway in the clear from the level of the curb).

BEING NO. 1006 West Dakota Street

EXHIBIT B



Quit-claim Deed No. 664/S

Printed and Sold by John C. Clark Co., 1326 Walnut St., Phila.

This Indenture Made the

20th day of FEBRUARY

in the year of our

Lord two thousand 18

Between DAWUD PRAY

This Document Recorded Doc Id: 53334171 Doc Code: D
03/01/2018 02:36 PM Receipt #: 18-20687
Rec Fee: \$256.75 State RTT: \$74.00 Local RTT: \$228.00
Records Department, City of Philadelphia MB

WILLIAM ERNEST JOHNSON III

Witnesseth, That the said part of the first part, for and in consideration of the sum of \$5,000

Lawful money of the United States of America, to his well and truly paid by the said Part of the second part, at and before the sealing and delivery of these presents, the receipt whereof is hereby acknowledge, has remised, released and quit-claimed, and by these presents, his remise, release and quit-claim unto the said part of the second part, and to and assigns, ALL

ALL THAT CERTAIN lot or piece of ground with the messuage or tenement thereof erected.

SITUATE on the South side of Dakota (formerly Dacota) Street at the distance of Ninety feet Westward from the West side of Tenth Street, in the 37th Ward of the City of Phila.

CONTAINING in front or breadth on said Dakota (formerly Dacota) Street Sixteen feet Two and one-half inches and extending of that width in length or depth Southward between parallel lines at right angles to said Dakota (formerly Dacota) Street sixty feet.

BOUNDED on the West partly by the head of a certain Two feet wide alley, leading Westward across the rear end of the lot adjoining to the Westward, the distance of Seventeen feet two and one-half inches into another certain Two feet wide alley which extends Northward into the said Dakota (formerly Dacota) Street (both of which alleys have been laid out and opened for the manual use and accommodation of the hereby granted premises and the two lots to the Westward thereof and adjoining and abutting upon said alleys, and the owners, tenants and occupiers thereof, with the right and privilege of the respective owners of the ground adjoining the said two feet wide alley running Northward to Build over or under the said alley to a depth of Thirty feet, leaving at least eight feet headway in the clear from the level of the curb).

BEING NO. 1006 West Dakota Street

BEING THE SAME PREMISES which Denise Taylor by deed dated April 28, 2010 and recorded on May 12, 2010 in Philadelphia County, Recorder of Deeds Office in Deed Book and Page #52210384, granted and conveyed unto Dawud Pray.

Together with all and singular the buildings, improvements, ways, streets, alleys, driveways, passages, waters, water-courses, rights liberties, privileges, hereditaments and appurtenances, whatsoever unto the hereby granted premises belonging, or in any wise appertaining, and the reversions and remainders, rents, issues, and profits thereof, and all the estate, right, title, interest property, claim and demand whatsoever of them,

the said Grantors, as well at law as in equity, of, in, and to the same.

To have and to hold the said lot or piece of ground with the buildings and improvements thereon erected, hereditaments, and premises hereby granted, or mentioned, and intended so to be, with the appurtenances, unto the said Grantees, their heirs and assigns, to and for the only proper use and behoof of the said Grantees, —their heirs and assigns forever.

And the said Grantors,

their heirs, executors and administrators do covenant, promise and agree, to and with the said Grantee s, their heirs —and assigns, by these presents, that —they —, the said Grantors, —their — heirs, all and singular the hereditaments and premises hereby granted or mentioned and intended so to be, with the appurtenances, unto the said Grantees, —their heirs—and assigns, against them, the said Grantors, their , heirs, and against all and every person and persons whomsoever lawfully claiming or to claim the same or any part thereof, by, from or under—him, her, them, or any of them, shall and will WARRANT and forever DEFEND.

In Witness Whereof, the parties — have — hereunto set their — hands and seals. Dated the day and year first above written.

Sealed and Delivered
IN THE PRESENCE OF US:

(SEAL)


DAWUD PRAY

Commonwealth of Pennsylvania
County of -

} ss:

On this, the 20th day of FEBRUARY, 2018 before me, a Notary Public for
the Commonwealth of Pennsylvania, residing in the PHILADELPHIA, PA 19133
the undersigned Officer,

personally appeared DAWUD PRAY

known to me (satisfactorily proven) to be the person whose name is (are) subscribed to the within instru-
ment, and acknowledged that he executed the same for the purposes therein contained.

I hereunto set my hand and official seal.

April Marie Scott-Street

Notary Public
Commonwealth of Pennsylvania

DEED

DAWUD PRAY

TO

WILLIAM ERNEST JOHNSON

NOTARIAL SEAL
April Marie Scott-Street, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires September 22, 2018

752-S John C. Clark Col, Phila

The Address of the above-named Grantee
is 301 Elywood St

Philadelphia, PA 19144

Original of the Grantee

W. Ernest Johnson

PHILADELPHIA REAL ESTATE TRANSFER TAX CERTIFICATION

DOC. ID

DATE RECORDED

CITY TAX PAID

Complete each section and file in duplicate with Recorder of Deeds when (1) the full consideration/value is/is not set forth in the deed, (2) when the deed is with consideration, or by gift, or (3) a tax exemption is claimed. If more space is needed, attach additional sheet(s).

A. CORRESPONDENT — All inquiries may be directed to the following person:

NAME Dawud Pray TELEPHONE NUMBER:
STREET ADDRESS 1006 West Dakota Street CITY Philadelphia STATE PA ZIP CODE 19133
AREA CODE ()

B. TRANSFER DATA

DATE OF ACCEPTANCE OF DOCUMENT:

GRANTEE (S) / LESSEE (S)

GRANTOR (S) / LESSOR (S) Dawud Pray
STREET ADDRESS 1006 West Dakota Street
CITY Philadelphia STATE PA ZIP CODE 19133
STREET ADDRESS 1006 West Dakota Street
CITY Philadelphia STATE PA ZIP CODE 19133

C. PROPERTY LOCATION

STREET ADDRESS 1006 West Dakota Street CITY Philadelphia STATE PA ZIP CODE 19133
COUNTY Philadelphia SCHOOL DISTRICT Philadelphia TAX PARCEL NUMBER
OFF. TOWNSHIP, BOROUGH

D. VALUATION DATA

1. ACTUAL CASH CONSIDERATION \$ 5,000
2. OTHER CONSIDERATION + 0
3. TOTAL CONSIDERATION = \$ 5,000
4. COUNTY ASSESSED VALUE \$ 62,300.00
5. COMMON LEVEL RATIO FACTOR X 1.02
6. FAIR MARKET VALUE = \$ 62,300.00
E. EXEMPTION DATA
1A. PERCENTAGE OF EXEMPTION 100%
1B. PERCENTAGE OF INTEREST CONVEYED 100%

2. Check Appropriate Box Below for Exemption Claimed

- ☐ Will or intestate succession (NAME OF DECEDENT) (ESTATE FILE NUMBER)
- ☐ Transfer to Industrial Development Agency.
- ☐ Transfer to agent or straw party. (Attach copy of agency/straw party agreement).
- ☐ Transfer between principal and agent. (Attach copy of agency/straw trust agreement). Tax paid prior deed \$ _____
- ☐ Transfers to the Commonwealth, the United States, and instrumentalities by gift, dedication, condemnation or in lieu of condemnation. (Attach copy of resolution).
- ☐ Transfer from mortgagor to a holder of a mortgage in default. Mortgage Book Number _____, Page Number _____
Mortgagee (grantor) sold property to Mortgagor (grantee) (Attach copy of prior deed).
- ☐ Corrective deed (Attach copy of the prior deed).
- ☐ Other (Please explain exemption claimed, if other than listed above.)

Under penalties of law or ordinance, I declare that I have examined this Statement, including accompanying information, and to the best of my knowledge and belief, it is true, correct and complete.

SIGNATURE OF CORRESPONDENT OR RESPONSIBLE PARTY

DATE